United States Courts
Southern District of Texas
FILED

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

AUG 29 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA	§		
<b>v.</b>	§ 8	CRIMINAL NO.	
	§		125
JOSE LUIS RODRIGUEZ-DIAZ RAUL ADAME-TREVINO	§ 8	19 CR	635
Defendants.	§		

## **INDICTMENT**

THE GRAND JURY CHARGES THAT:

### **COUNT ONE**

(Conspiracy to Possess With Intent to Distribute Controlled Substance)

Between on or about July 17, 2019, and continuing until on or about August 1, 2019, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

## JOSE LUIS RODRIGUEZ-DIAZ AND RAUL ADAME-TREVINO

did knowingly and intentionally conspire and agree together and with other person or persons unknown to the Grand Jurors, to possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

#### **COUNT TWO**

(Possession With Intent to Distribute Controlled Substance)

On or about August 1, 2019, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

JOSE LUIS RODRIGUEZ-DIAZ AND RAUL ADAME-TREVINO did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

# NOTICE OF CRIMINAL FORFEITURE (21 U.S.C. § 853(a))

Pursuant to Title 21, United States Code, Section 853(a), the United States of America gives notice to Defendants,

## JOSE LUIS RODRIGUEZ-DIAZ AND RAUL ADAME-TREVINO,

that upon conviction of an offense in violation of Title 21, United States Code, §§ 841 or 846, the following is subject to forfeiture:

- 1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- 2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

#### PROPERTY SUBJECT TO FORFEITURE

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following:

- 1) Pioneer Arms, Model PPS43-C, 7.62x25 caliber pistol;
- 2) 4 magazines for Pioneer Firearms, Model PPS43-C pistol;
- 3) 253 rounds of 7.62x25 caliber ammunition;
- 4) Smith & Wesson, Model #36, .38 in caliber revolver;
- 5) 7 rounds of .38 caliber ammunition
- 6) Smith & Wesson, Model #SW40VE, .40 in caliber pistol;

- 7) 1 magazine for Smith & Wesson, Model #SW40VE pistol;
- 8) 15 rounds of .40 caliber ammunition;
- 9) Glock, Model 19X, 9mm in caliber pistol;
- 10) 1 magazine for Glock, Model 19X pistol;
- 11) 104 rounds of 9mm ammunition;
- 12) Lorcin, Model L9MM, 9mm in caliber pistol;
- 13) 1 magazine for Lorcin, Model L9MM pistol;
- 14) Corba, Model CB38, .38 in caliber pistol;
- 15) Bushmaster, Model XM15-E2S, .223 in caliber rifle;
- 16) 10 magazines for Bushmaster, Model XM15-E2S rifle;
- 17) 320 rounds of .223 caliber ammunition;
- 18) Remington, Model 870, 12 Gauge shotgun; and
- 19) 67 shells of 12 gauge ammunition.

#### A TRUE BILL:

**ORIGINAL SIGNATURE ON FILE** 

FOREPERSON OF THE GRAND JUNY

RYAN K. PATRICK UNITED STATES ATTORNEY

LEO J. LEO, III

Assistant United States Attorney